

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONNA KASSMAN, SPARKLE :
PATTERSON, JEANETTE POTTER, :
ASHWINI VASUDEVA, TINA BUTLER, :
CHERYL CHARITY, HEATHER :
INMAN, NANCY JONES AND CAROL :
MURRAY, et al., individually and on :
behalf of a class of similarly-situated :
female employees, :

Hon. Lorna G. Schofield
Case No.: 11-cv-03743 (LGS)

Civil Action

Plaintiffs, :

v. :

KPMG LLP, :

Defendant. :

PROPOSED ORDER REGARDING BRIEFING SCHEDULE

WHEREAS, the Court previously entered a schedule regarding Expert Discovery and Motions regarding class and collective certification;

WHEREAS, the Court has required the Parties to submit a proposed order regarding briefing deadlines for class and collective certification;

It is hereby **ORDERED** that the following briefing schedule be adopted:

A. Motions for Class and Collective Certification

1. Plaintiffs' single opening brief in support of their motions for Rule 23 and Equal Pay Act certification must be filed by **January 31, 2018**.
2. KPMG's single responsive brief must be filed by **April 13, 2018**.
3. Plaintiffs' single reply brief must be filed by **June 22, 2018**.
4. The written discovery as set forth in Docket 640 will be served as promptly as reasonably possible, but in any event no later than **3 weeks after the** filing of such declaration. If one of Plaintiffs' declarants recalls being put on a Performance Improvement Plan, Plaintiffs will notify KPMG of this at the time the declarations are filed and KPMG's production of Performance Improvement Plans is limited to those declarants so identified. Within one week of the other side identifying the

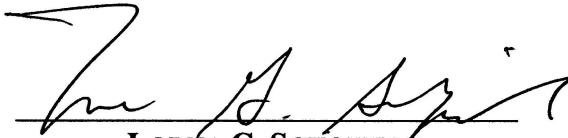
declarants it seeks to depose, the Parties will provide proposed deposition dates. Depositions as set forth in Docket 640 will be concluded 2 weeks prior to the next filing date in this schedule.

B. Daubert Motions to Exclude Expert Testimony Related to Class Certification and Collective Decertification

1. KPMG's motions to exclude expert testimony related to class certification and collective decertification must be filed by **April 13, 2018**.
2. Plaintiffs' oppositions to KPMG's motions must be filed by **May 18, 2018**.
3. Plaintiffs' motions to exclude expert testimony related to class certification and collective decertification must be filed by **June 22, 2018**.
4. KPMG's oppositions to Plaintiffs' motions must be filed by **July 18, 2018**.

New York, New York

Dated: January 18, 2018



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE